

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

WALT JOE WINSTON AKA
WALT WINSTON
DBA WALLY GOAT MUSIC (BMI)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

YOUTUBE DBA GOOGLE
PLUS 11 OTHER DEFENDANTS
SEE ATTACHED

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>WALT WINSTON</u>
Street Address	<u>723 VANDALIA #11</u>
City and County	<u>COLLINSVILLE, IL</u>
State and Zip Code	<u>62234</u>
Telephone Number	<u>314 277 3982</u>
E-mail Address	<u>Waltwinston1964@icloud.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>YOU-TUBE DBA GOOGLE</u>
Job or Title (if known)	<u>CORPORATE ENTITY</u>
Street Address	<u>901 CHERRY AVE 2nd floor</u>
City and County	<u>San Bruno</u>
State and Zip Code	<u>California</u>
Telephone Number	<u>650 253-0000</u>
E-mail Address (if known)	<u>USLawEnforcement@google.com</u>

Defendant No. 2

(See attached)

Name	<u>JOHN DOE #1 aka Daddy Derek and</u>
Job or Title (if known)	<u>Unknown other aliases</u>
Street Address	<u>unknown</u>
City and County	<u>unknown</u>

State and Zip Code Unknown
 Telephone Number Unknown
 E-mail Address Unknown
 (if known)

Defendant No. 3 See attached
 Name John Doe #2 aka Jeff Robertson
 Job or Title and other aliases
 (if known)
 Street Address Unknown
 City and County Unknown
 State and Zip Code Unknown
 Telephone Number Unknown
 E-mail Address Unknown
 (if known)

Defendant No. 4 See attached
 Name John Doe #3 AKA OWEN REAL
 Job or Title Unknown
 (if known)
 Street Address Unknown
 City and County Unknown
 State and Zip Code Unknown
 Telephone Number Unknown
 E-mail Address Unknown
 (if known)

II. Basis for Jurisdiction

See Attached

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) WALT WINSTON, is a citizen of the State of (name) ILLINOIS.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) YOUTUBE OR GOOGLE is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$5 MILLION COMPULSORY DAMAGES
\$5 MILLION PUNITIVE DAMAGES
FOR VIOLATION OF MY PRIVACY AND COPYRIGHT PROTECTED
UNDER FEDERAL LAW
\$1000 FOR ROYALTIES FROM GOOGLE EARNED THROUGH (BMI)
UNPAID

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

THE DEFENDANTS VIOLATED MY PRIVACY
THE DEFENDANTS HARASSED ME AS WELL AS LIBELED, SLANDERED,
AND DEFAMED ME USING COPYRIGHTED MATERIALS BELONGING TO ME
STRICTLY FOR THE USE OF SLANDER AND DEFAMATION
CAUSING UNDOUR HARM, EXTREME PAIN AND SUFFERING
AND THE PREMATURE DEATH OF MY THIRD FORMER WIFE
AND PARTNER CHRISTINE WINSTON. THE DEFENDANTS USED MY
MUSIC, PICTURES AND VIDEOS OF ME WITHOUT MY CONSENT.
GOOGLE OWES ROYALTIES FROM MUSIC PLAYED ON THEIR WEBSITES

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

THE REMOVAL OF ALL NEGATIVE AND DEFAMATORY COMMENTS AND VIDEOS MADE AGAINST ME, THE REMOVAL OF ALL DEFENDANT'S YOUTUBE AND GOOGLE ACCOUNTS PERMANENTLY \$5 MILLION FOR DAMAGES \$5 MILLION FOR EMOTIONAL DISTRESS ADDITIONAL MONEY TO BE DONATED TO THE KIDNEY FOUNDATION AND MAKE EVERYONE AWARE OF CYBER BULLYING.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: June 28th 2019.

Signature of Plaintiff

Printed Name of Plaintiff

Walt Winston
WALT WINSTON

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

IN THE MATTER OF

WALT WINSTON
(PLAINTIFF)

VS

YOUTUBE
DBA GOOGLE INC LOCATED AT 1600 AMPITHEATRE PARKWAY
MOUNTAIN VIEW, CA
YOUTUBE, INC ATTN: LEGAL SUPPORT 901 CHERRY AVE
SECOND FLOOR, SAN BRUNO, CA

AND THE FOLLOWING UNKNOWN DEFENDANTS ONLY KNOWN TO ME BY THEIR
USER NAMES

JOHN DOE #1 AKA CLEARSKY PRODUCTIONS AKA DADDY DEREK,
AKA LENNY LEGGO SHOW AKA I.M. CROSBY AKA COSBY THE CATEPILLAR
JOHN DOE #2 AKA JEFF ROBERSON AKA JEFF'S DAD, AKA SIR SALTY
JOHN DOE #3 OWEN REAL
JOHN DOE #4 AKA BLACKHAWKS FAN 95
JOHN DOE #5 AKA TRENT BULLARD
JOHN DOE #6 AKA JACOB WISE
JOHN DOE #7 AKA DARK CHICKEN
JOHN DOE #8 AKA CLEAR TONE
~~JANE DOE #1 AKA JANICE MACMILLIAN~~ *hw*
PAT COOKSEY AKA PAT RUBBISH
CHARLES BERNSTEIN
AKA SID YIDDISH AKA DOC MAC ON FACEBOOK

THE FOLLOWING DEFENDANTS NAMED IN THIS COMPLAINT ARE
SUBJECTS HAVE ENGAGED IN THE CRIMINAL ACTIVITY THAT IS CONSIDERED
HARASSMENT, CYBER HARASSMENT, CYBER BULLYING,
CYBERSTALKING, AS WELL AS CIVIL VIOLATIONS OF SLANDER, LIBEL, AND
DEFAMATION OF CHARACTER, AS WELL AS THREATS AND FELONY CRIMINAL
HARASSMENT THAT WERE MADE RECENTLY AND ONGOING SINCE 2011 ON
YOUTUBE AND ON FACEBOOK

I BELIEVE THE FACTS I AM PRESENTING TO THIS COURT TO BE TRUE TO THE
BEST OF MY KNOWLEDGE THAT SEVERAL LAWS BOTH FEDERAL AND STATE
LAWS HAVE BEEN BROKEN AS RECENTLY AS JUNE OF 2018 AND BEFORE.
SINCE THE HARASSMENT HAS BEEN ONGOING WE BELIEVE THE STATUE OF
LIMITATIONS HAS NOT EXPIRED.

THE RELIEF I AM SEEKING AND DEMANDING FROM THE COURT IS AS FOLLOWS...

I AM SEEKING ARRESTS FOR THE ALLEDGED CRIMES COMMITTED AS WELL AS PUNITIVE AND COMPULSORY DAMAGES FROM THE NAMED DEFENDANTS.

I AM ALSO SEEKING RELIEF OF THESE DAMAGES AND DEMAND THAT GOOGLE YOUTUBE REMOVE AND PERMANENTLY BAN ALL OF THE DEFENDANTS FROM GOOGLE YOUTUBE FOR A LIFETIME BAN FOR THEIR CONDUCT.

I AM SEEKING POSITIVE PROMOTION OF MY COPYRIGHTED WORKS AS A FORM OF RELIEF FROM THE ONGOING DAMAGES I HAVE INCURRED AS A RESULT OF CRIMINAL NEGLIGENCE ON THE PART OF GOOGLE/YOUTUBE AS GOOGLE REFUSED TO RESPOND TO MY COMPLAINTS IN A TIMELY MANNER.

I AM SEEKING \$750 MILLION DOLLARS IN COMPENSATION FROM GOOGLE YOUTUBE, FOR THE PAIN AND SUFFERING AS WELL AS COURT COSTS AND LEGAL EXPENSES THAT ARE NOW INCURRING AND GROWING TO REMOVE THE HARMFUL AND SLANDEROUS CONTENT GOOGLE ALLOWED THE CO-DEFENDANTS TO CONTINUE THEIR LIBEL, SLANDER, AND DEFAMATION AS WELL AS BLATANT CYBERBULLYING AND DAILY ATTACKS ON YOUTUBE IN VIOLATION OF THEIR OWN COMMUNITY STANDARDS.

I AM ALSO SEEKING AND DEMANDING THE ENFORCEMENT OF GOOGLE'S OWN CODE OF COMMUNITY STANDARDS AND MANDATE THE USE OF A LIVE HUMAN OPERATOR TO BE ON CALL 24-7 TO ADDRESS ANY FUTURE CONCERNS FROM ANY GOOGLE/YOUTUBE USER THAT HAS SUFFERED FROM THE SAME ILLEGAL ACTIVITIES THAT ARE ONGOING INTERNET WIDE SO THAT OTHER VICTIMS HAVE A RECOURSE FROM CYBERBULLYING.

I AM SEEKING ADDITIONAL COMPENSATION IN THE FORM OF UNPAID ROYALTIES FROM THE LEGAL AS WELL AS THE ILLEGAL USE OF MY COPYRIGHTED MUSIC REGISTERED WITH BMI UNDER WALLY GOAT MUSIC, FROM 2009 TO THE PRESENT. I BELIEVE I AM OWED ANOTHER SUM OF \$1000 UNDER THE AGREEMENT BETWEEN GOOGLE/YOUTUBE AND BMI WHICH I AM A MEMBER OF.

I ASK THE COURT TO ORDER THESE DEFENDANTS TO CEASE AND DESIST THE LIBEL, SLANDER, DEFAMATION, AND OUTRIGHT HARASSMENT. AND ASK THE COURTS TO HOLD THESE DEFENDANTS CRIMINALLY LIABLE FOR THE THREATS, STALKING, CYBERSTALKING, AS WELL AS HARASSMENT.

I HAVE SEVERAL FILES OF EVIDENCE THAT WILL BE PRESENTED TO THE COURT AS WELL AS THE DEFENDANTS WHEN THE TIME COMES.

GOOGLE/YOUTUBE KNEW OF THE ONGOING CRIMINAL BEHAVIOR (HARASSMENT) AND DID VERY LITTLE IF ANYTHING AT ALL TO STOP THE HARASSMENT, SLANDER AND DEFAMATION ONCE IT WAS REPORTED. GOOGLE WAS WARNED IN MY REPORTS THIS WAS ONGOING HARASSMENT AND CHOSE TO DO VERY LITTLE OR NOTHING AT ALL WHICH WOULD MAKE GOOGLE/YOUTUBE LIABLE ON ALL CHARGES AND COUNTS

NEITHER YOUTUBE / GOOGLE OR FACEBOOK SHALL SEEK PROTECTION UNDER SECTION 230 SINCE THE HARASSMENT AND DEFAMATION VIOLATES GOOGLE'S AND FACEBOOK'S OWN TERMS OF SERVICE AND ITS OWN CODE OF CONDUCT. THE LAWS IN MISSOURI AND IN ILLINOIS ARE CLEAR ON THIS ISSUE. THE FACTS OF THE MATTER ARE THESE DEFENDANTS HAVE MADE KNOWINGLY FALSE STATEMENTS IN AN EFFORT ONLY TO DAMAGE MY GOOD NAME AND REPUTATION, AND THE DEFENDANTS CONTINUED THEIR ACTIVITY AFTER THEY WERE WARNED TO STOP AND THAT FURTHER COMMUNICATION WAS CONSIDERED HARASSMENT UNDER MISSOURI STATUTE 252.000
I HAVE MOVED TO ILLINOIS IN SEPTEMBER OF 2018 AND LEARNED THAT THE DEFENDANTS BEHAVIOR IS ALSO IN VIOLATION OF ILLINOIS STALKING LAWS
720 ILCS 5/12-7.3 STALKING
720 ILCS 5/12-7.4 AGGRAVATED STALKING
720 ILCS 5/12-7.5 CYBERSTALKING

MOST IF NOT ALL OF THE DEFENDANTS ALSO VIOLATED THE DCMA USING COPYRIGHTED MATERIALS INCLUDING INTELLECTUAL PROPERTY (MUSIC) AND PHOTOGRAPHS OF MINE WITHOUT MY PERMISSION WITH THE PURPOSE OF THEIR CONTINUED CYBERSTALKING ON THE WEB AND HARASSMENT! THE DEFENDANTS ALSO VIOLATED THE COPYRIGHTS OF FREMANTLE THE OWNERS OF THE TELEVISION PROGRAM AMERICA'S GOT TALENT IN WHICH I WAS A CONTESTANT IN 2011, AND IN 2012, AND HAVE AN ORAL AGREEMENT TO INFORM FREMANTLE OF THEIR PRODUCTS BEING ILLEGALLY USED WITHOUT THEIR CONSENT AS WELL AS MY CONSENT.